

From: [Jay, Michael](#)
To: [Weber, Rebecca](#)
Subject: FW: Language in MDNR's Submittal on How the Historic Monitors Impacted Their Recommendation
Date: Monday, December 07, 2015 3:49:15 PM

fyi

Mike Jay
Chief of Atmospheric Programs Section
Air Planning and Development Branch
USEPA R7
913-551-7460

From: Jay, Michael
Sent: Monday, December 07, 2015 3:49 PM
To: Peter, David <peter.david@epa.gov>
Subject: RE: Language in MDNR's Submittal on How the Historic Monitors Impacted Their Recommendation

(b) (5)
[Redacted]
[Redacted]
[Redacted]
[Redacted]

Mike Jay
Chief of Atmospheric Programs Section
Air Planning and Development Branch
USEPA R7
913-551-7460

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From: Peter, David
Sent: Monday, December 07, 2015 2:09 PM
To: Jay, Michael <Jay.Michael@epa.gov>
Subject: Language in MDNR's Submittal on How the Historic Monitors Impacted Their Recommendation

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"Ameren Labadie Energy Center

For the area surrounding the Ameren Labadie Energy Center, the Air Program recommends an unclassifiable area designation. Our recommendation is based on ***varying modeling results showing both violations and no violations*** of the SO₂ standard around Labadie, depending on the options and inputs chosen. In addition to these modeling evaluations of Labadie, ***preliminary data from new ambient SO₂ monitors near the plant*** is available. Since the start of operation in April 2015, these monitors have been measuring SO₂ concentrations below the 1-hour SO₂ standard of

75 ppb. A new state statute, Section 643.650, RSMo, (SB 445 and HB 92 from the 2015 legislative session), became effective August 28, 2015. Section 643.650, RSMo, directs the department to consider SO₂ monitoring data for sources that choose to monitor to characterize their air quality. Though the dataset from Labadie's new SO₂ monitors is limited, we must consider it, consistent with state law. Because it cannot be determined based on available information whether the area is or is not meeting the 1-hour SO₂ standard, the Air Program recommends an unclassifiable designation for the area near Labadie. In addition to the Air Program's modeling evaluation and review of available SO₂ monitoring data, we are including modeling analyses from Ameren Missouri and Washington University Environmental Law Clinic that we received during the public comment period as further support for the unclassifiable designation around Labadie. These analyses are in Appendix G."

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"RECOMMENDATION FOR 1-HOUR SO₂: UNCLASSIFIABLE

C. AMEREN LABADIE ENERGY CENTER

The Ameren Labadie Energy Center is a coal-fired electric generating facility located in Franklin County, Missouri. Ameren recently installed and began operating ambient SO₂ monitors and a site-specific meteorological station near Labadie in April 2015. ***Historical data from MDNR monitors that were near Labadie but are no longer operating is also available...***"

"C.1 Monitoring Data

Ambient air quality SO₂ monitoring data is available for the area around the Ameren Labadie Energy Center. New ambient monitoring stations recently began operating around Labadie and ***historical data from former MDNR monitoring sites is available for the area***. A map depicting the locations of new and historical monitoring stations is in Figure 8."

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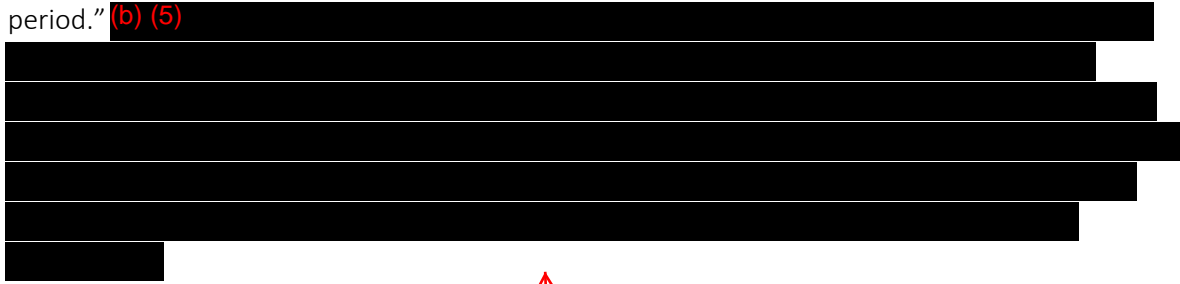
"Information on available data from former MDNR ambient air monitoring sites known as Augusta (AQS #29-183-0009) and Augusta Quarry (AQS # 29-183-0010) can be found in the 2015 Monitoring Network Plan and the AirData website (www.epa.gov/airdata). These sites were in operation from 1987-1994 and 1994-1998, respectively, but subsequently discontinued due to relatively low monitored concentrations as compared to the previous SO₂ NAAQS; their continued operation was no longer required by NAAQS compliance monitoring rules in place at that time.

The previous SO₂ standards, established in 1971, were set at 140 ppb (24-hour) and 30 ppb (Annual). ***Historical monitoring data from the Augusta and Augusta Quarry sites includes periods of recorded SO₂ levels below both the previous and new SO₂ standards***. A summary of monitoring data from the Augusta and Augusta Quarry sites is included in Tables 12 through 15."

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"C.2 Emissions Data

Labadie's historical annual SO2 emissions from 1992 through 2013 are displayed in Figure 9. This figure, which was taken from the 2015 Monitoring Network Plan, illustrates the **significant SO2 emissions reductions** at the Labadie Energy Center that occurred over this time period." (b) (5)



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